

**ENTERED**

September 15, 2023

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY  
COURT FOR THE SOUTHERN DISTRICT OF  
TEXAS HOUSTON DIVISION**

<b>In re:</b>	§	
	§	<b>Case No. 20-33948 (MI)</b>
<b>Fieldwood Energy III LLC, <i>et al.</i>,</b>	§	
	§	<b>Chapter 11</b>
<b>Post-Effective Date Debtors<sup>1</sup>.</b>	§	
	§	<b>Jointly Administered</b>

**STIPULATION AND AGREED ORDER EXTENDING RESPONSE DATE  
AND RESETTING HEARING DATE ON PLAN ADMINISTRATOR'S  
OBJECTION TO ILX PROSPECT KATMAI, LLC'S AND  
RIDGEWOOD KATMAI, LLC'S  
PROOF OF CLAIM  
[this relates to Dkt. No. 2831]**

This stipulation and agreement (the “**Stipulation**”) is entered into by and among (i) David Dunn, the plan administrator (the “**Plan Administrator**”) appointed pursuant to the Notice of (I) Entry of Order Confirming Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors [Docket No. 2016]<sup>2</sup>; and ILX Prospect Katmai, LLC and Ridgewood Katmai, LLC (collectively, “**Katmai**”) regarding the Plan Administrator’s Objection to the Proof of Claim of ILX Prospect Katmai, LLC and Ridgewood Katmai, LLC [Docket No. 2831] (the “**Objection**”). The Parties hereby stipulate and agree as follows:

**WHEREAS**, Katmai timely filed Proofs of Claim Numbers 874 and 875 (the “**Katmai**

---

<sup>1</sup> The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III, LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “Post-Effective Date Subsidiaries”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtor), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

<sup>2</sup> Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to such terms in the Plan.

Claims").

**WHEREAS**, the Plan Administrator filed his Objection to the Katmai Claims on August 15, 2023, which included a response date of September 14, 2023 and an initial pre-trial hearing on October 2, 2023 @10:30 am CT.

**WHEREAS**, the Parties have agreed to enter into and jointly submit this Stipulation extending Katmai's response date and resetting the date of the initial pre-trial hearing in connection with the Objection.

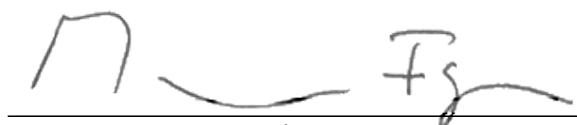
**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:**

1. Katmai's deadline to respond to the Objection is extended to and through October 18, 2023, subject to further extensions based on the Parties' agreement.
2. The initial pre-trial hearing on the Objection is reset to November 6, 2023 at 10:00 a.m.

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day and year first written below.

**IT IS SO ORDERED**

Signed: September 15, 2023



\_\_\_\_\_  
Marvin Isgur  
United States Bankruptcy Judge

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day and year first below written.

Dated: September 14, 2023

**BOND ELLIS EPPICH SCHAFER JONES SIDLEY AUSTIN LLP  
LLP**

By: /s/ Aaron Guerrero

Ken Green  
Texas Bar No. 24036677  
Aaron Guerrero  
Texas Bar No. 24050698  
Bryan Prentice  
Texas Bar No. 24099787  
950 Echo Lane, Suite 120  
Houston, Texas 77024  
(713) 335-4990 telephone  
(713) 335-4991 facsimile  
[Ken.green@bondsellis.com](mailto:Ken.green@bondsellis.com)  
[Aaron.guerrero@bondsellis.com](mailto:Aaron.guerrero@bondsellis.com)  
[Bryan.prentice@bondsellis.com](mailto:Bryan.prentice@bondsellis.com)

/s/ Jeri Leigh Miller

Duston K. McFaul (TX Bar No. 24003309)  
Michael Fishel (TX Bar No. 24082998)  
Jeri Leigh Miller (TX Bar No. 24102176)  
SIDLEY AUSTIN LLP  
1000 Louisiana St., Suite 5900  
Houston, Texas 77002  
Telephone: (713) 495-4500  
Facsimile: (713) 495-7799  
Email: [dmcfaul@sidley.com](mailto:dmcfaul@sidley.com)  
[mfishel@sidley.com](mailto:mfishel@sidley.com)  
[jeri.miller@sidley.com](mailto:jeri.miller@sidley.com)

**ATTORNEYS FOR DAVID DUNN, PLAN  
ADMINISTRATOR FOR THE POST-  
EFFECTIVE DATE DEBTORS**

**ATTORNEYS FOR RIDGEWOOD  
KATMAI, LLC AND ILX PROSPECT  
KATMAI, LLC**